



August 28, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90  
Comments on preliminary determination of Rate-of-Return study areas  
100 percent overlapped by unsubsidized competitors

On July 29, 2015 the Wireline Competition Bureau (Bureau) released its preliminary determination of rate-of-return study areas that are 100 percent overlapped by an unsubsidized competitor.<sup>1</sup> Vantage Point Solutions, a consultant of Monon Telephone (Monon), files these comments to dispute the Bureau's preliminary determination.

## **I. Background**

The Federal Communications Commission (Commission) adopted a rule in its 2011 *Transformation Order* eliminating high-cost support in study areas where unsubsidized competitors offer qualifying voice and broadband services throughout the study area.<sup>2</sup> In its December 2014 CAF Order, the Commission increased minimum speed standards for carriers receiving high-cost support to 10 Mbps downstream and 1 Mbps upstream (10/1).<sup>3</sup>

Last month the Bureau identified 15 rate-of-return RLECs, including Monon, whose study areas had been preliminarily determined to be 100 percent covered by unsubsidized competitors.<sup>4</sup> If such a determination is upheld by the Commission, Monon would begin a step down of its high cost support.

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<sup>1</sup> Public Notice, DA 15-868, July 29, 2015.

<sup>2</sup> *USF/ICC Transformation Order*, 76 FR 73830, November 29, 2011.

<sup>3</sup> Connect America Fund Final Rule, 80 FR 4446, January 27, 2015.

<sup>4</sup> Public Notice, DA 15-868, July 29, 2015.

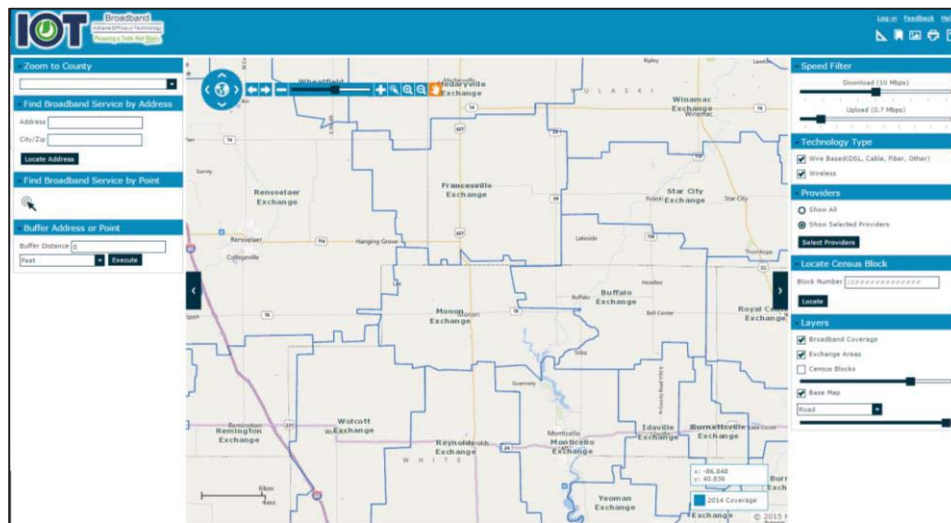
## II. Coverage of Unsubsidized Competitors

The Bureau's July 29 public notice listed two unsubsidized competitors, Comcast and TransWorld, whose coverage allegedly combines to cover 100 percent of Monon's study area with qualifying voice and broadband service. Vantage Point disputes that determination. No publicly-available information exists indicating the two companies provide qualifying service throughout the study area. Instead, information from the Indiana Broadband Map indicates the companies do not offer qualifying service throughout the study area.

The Indiana Broadband Map is a project of the Indiana Office of Technology (IOT). The IOT collects up-to-date and current data "regarding the availability of broadband services, the technology used to provide service, the speed of the service, and the location of certain broadband infrastructure." The current version of the IOT's Indiana Broadband Map<sup>5</sup> contains data from 2014. The Bureau's July 29 public notice noted their preliminary determination was based upon Form 477 data "as of December 31, 2014," or roughly the same timeframe.<sup>6</sup>

The Indiana Broadband Map displays a map of coverage for each telecommunications provider. The screenshot below indicates the coverage for TransWorld (covered areas appear blue) under the following system filters:

- 10 Mbps download
- .7 Mbps upload (1 Mbps was not a filter option)
- Monon Exchange Area



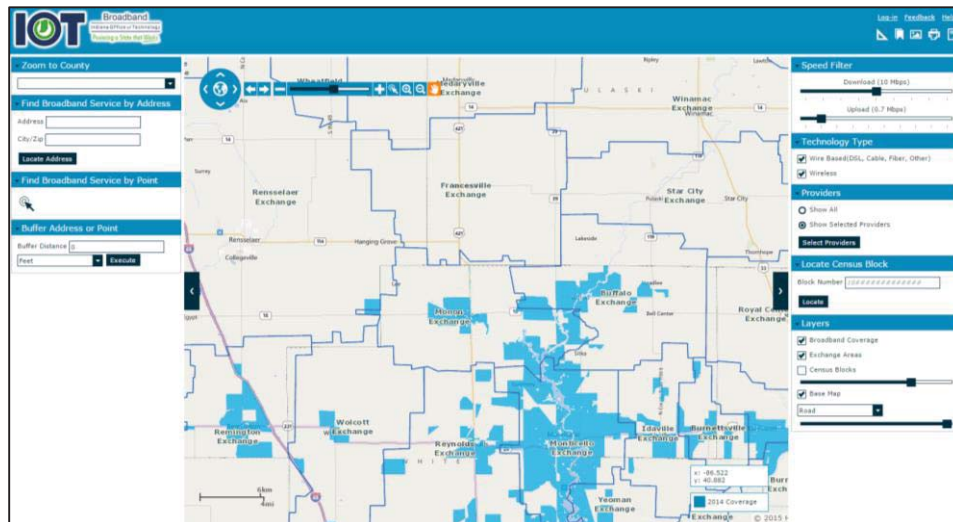
According to the Indiana Broadband Map, TransWorld does not provide broadband speeds that meet the Commissions minimum standards anywhere within Monon's study area.

<sup>5</sup> Accessible at [www.indianabroadbandmap.com](http://www.indianabroadbandmap.com).

<sup>6</sup> ¶ 11 of the Public Notice, DA 15-868, July 29, 2015.

Comcast does provide service in the Monon study area meeting the Commissions standards, but does not cover the entire study area. The screenshot below indicates the coverage for Comcast (covered areas appear blue) under the following system filters:

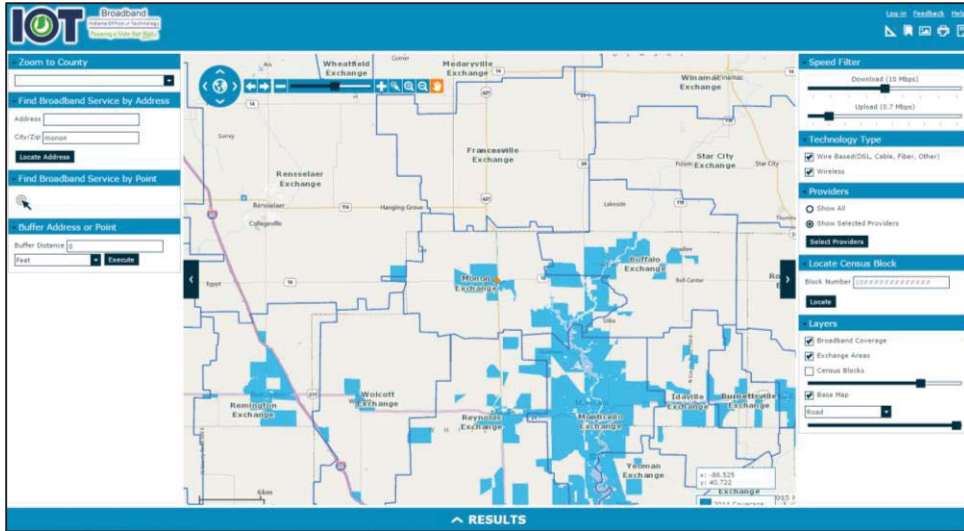
- 10 Mbps download
- .7 Mbps upload (1 Mbps was not a filter option)
- Monon Exchange Area



According to the Indiana Broadband Map, Comcast does not provide qualifying broadband service throughout the Monon study area.

### III. Conclusion

When the coverage areas are combined, it is clear Comcast and TransWorld together do not provide qualifying service throughout the Monon study area.



As such, the Commission should not confirm the Bureau's preliminary determination of 100 percent overlap by unsubsidized competitors. Monon should continue to access high-cost support to provide much-needed universal service to their rural service territory.

If you require further information, please contact me at [dusty.johnson@vantagepnt.com](mailto:dusty.johnson@vantagepnt.com) or 605-995-1746.

Respectfully submitted,

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